



HOME BUILDERS
ASSOCIATION
OF TRI-CITIES

MEMORANDUM

TO: Washington State Legislators

FROM: Michele Brich, Executive Director *MB*

RE: Washington Stormwater Management Study
Report and Recommendations from the Stormwater Policy Advisory
Committee

As a participant in the Stormwater Policy Advisory Committee and the Stormwater Management Steering Committee, I offer the following perspective regarding the Report and Recommendations (Report).

Dozens of volunteers and regulators contributed their time and effort to produce the Report. Each provided thoughtful and productive information and they are to be commended for their participation. The perspective I offer here is not to take exception to the Report, but to bring your attention to areas I believe were not adequately addressed.

Overall, the Report is limited in that it does not provide the information you need to make decisions regarding stormwater management. The costs and benefits of compliance with stormwater regulations are addressed, but the problems associated with stormwater management and the impacts (short and long term) to your constituents are not.

Although natural resource protection is important, it must be balanced with the need for development and growth. The Report does not reflect this balance. For example, in the first sentence of the Executive Summary, growth is clouded by the phrase "the public's stated desire to develop and expand the use of the land." The public doesn't just want to build, it needs to build in order to house growing families and a burgeoning work force.

The Report understates the immense investment in infrastructure and other mechanisms already in place for stormwater management in Washington. Further, in many instances, it overstates the stormwater problem. The first line of "Environmental Impacts" reads "Human activities on the landscape change stormwater flows and contribute pollutants to water bodies" without citing specific, conclusive scientific evidence to such. (It was inappropriate to include the Karr and May study in the Executive Summary, particularly because it appears to have been inserted to lend credence to the "sky is falling" perspective, was not part of any discussion by the Steering Committee, and is not included in the main body of the Report.)

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Memorandum
Washington State Legislators
page two

Under "Multiple Perspectives," the statement is made that rural areas "do not or have not perceived the need" to create sophisticated stormwater management programs and utilities. This suggests that all rural areas have serious stormwater problems that must be addressed. In reality, it may not be necessary (except as required by law) to implement sweeping new stormwater controls that provide few, if any, measurable benefits. In addition, these and other federal and state mandates make it virtually impossible for many communities, large or small, to comply without neglecting other essential local governmental services.

The Report covers the important issue of "who pays" for stormwater, but does not adequately address the "why" of the high costs of stormwater management. This includes excessive and redundant regulatory programs that require numerous permits, extensive stormwater plans as well as expensive detention, retention, and treatment facilities - all of which contribute to rapidly escalating homebuilding costs.

Further, the Report fails to address the impacts of stormwater management costs on the public and private sector. Everyone - government, property owners, and the public - will see the economy struggle as projects big and small, government and private, are forced to pay for exorbitantly expensive stormwater systems and wait for months or years (with finance charges rapidly accruing) for agency approval.

The potential for the Coordination Team to effectively untangle the web of stormwater management regulations and establish consistent policies is very real. However, the potential for the Coordination Team to become another bureaucracy, caught up in its own funding and turf battles, is also very real. If the Coordination Team is created as recommended in the Report, the Legislature should closely observe its activities and progress.

The recommendation to analyze stormwater costs on a risk-based approach is commendable and I believe that to be one of the strengths of this Report. Our limited resources should be first spent where there is the highest risk to human health and safety and where there will be measurable benefits to human health and safety.

Thank you for your consideration of my perspective on the Washington Stormwater Management Study.